KAUFMAN & CANOLES
| A Professional Corporation |
Attorneys and Counselors at Law

Marina Liacouras Phillips
757 / 624-3279
mlphillips@kaufcan.com

757 / 624-3000
fax: 757 / 624-3169

Mailing Address:
P.O. Box 3037
Norfolk, VA 23514

150 West Main Street
Suite 2100
Norfolk, VA 23510

May 23, 2008

Mr. Carl D. Thomas
Virginia Department of Environmental Quality
5636 Southern Boulevard
Virginia Beach, VA 23465

Re: Application for Permit Renewal
VPDES No. VA0087599
Associated Naval Architects, Inc.
Our Matter No. 131443

Dear Mr. Thomas:

Enclosed please find an original and five copies of the application for renewal of VPDES Permit No. VA0087599 issued to Associated Naval Architects, Inc. (ANA). Historically ANA has had four outfall permitted as both process waste water and storm water discharges. This application includes one additional storm water outfall identified as a mid-yard drain.

Due to the similarity of the industrial activity that takes place on the four marine railways and as marine railway 3 is the most frequently used of the four marine railways, previous permits issued to ANA have only required the sampling of process waste water at Outfall 003. Consistent with that premise, the renewal application enclosed provides process waste water monitoring results for outfall 003 only, as those results are representative of process waste water that would be generated at any of the marine railways. Acute toxicity testing was performed at all four railways. ANA requests that the Department of Environmental Quality (DEQ) consider reducing the toxicity sampling requirement to Outfall 003 in the next permit.

Process waste water monitoring results included in the renewal applications do not provide results to biological oxygen demand (BOD), chemical oxygen demand (COD) or total organic chloride (TOC). ANA requests waivers for the provision of this information. The proximity of salt water will interfere with the TOC and prevent a sample from being representative of the discharge.

In the consideration of prior permits for ANA, there has been no protocol agreed upon by ANA and the DEQ for the receipt of a sample that is representative of storm water leaving the marine railways. The sample site is diffuse and broad and a representative sample of storm water cannot be obtained. Accordingly, storm water monitoring data for the railways has not been provided in the

renewal application. ANA requests that sampling of storm water from the marine railways continue to be left out of its discharge permit.

Storm water monitoring results are included in the renewal application for the new outfall, the mid-yard drain, only. As the end of the discharge pipe is below the water level, the sample was taken from the drain. BMPs for the mid-yard drain include the placement of filter fabric over and around the drain. This BMP had to be removed in order to obtain the storm water sample from within the drain, so the actual quality of the discharge from this source will be better than shown by the monitoring data included in the renewal application.

The mid-yard drain is in a remote location on the ANA property, distant from the industrial activities at the shoreline. ANA anticipates that contamination in the storm water that enters the mid-yard drain and thus is discharged into the Elizabeth River will be much less than ANA's process water. The sampling of the process water from Outfall 003 will give the DEQ adequate information regarding the type and amounts of pollutants that ANA discharges. Furthermore, monitoring of storm water associated with regulated activity such as that occurring on the marine railways is not required to be monitored. Accordingly, ANA requests that no monitoring be required for the mid-yard storm water drain.

If you have any questions or comments regarding this information, do not hesitate to contact me. I look forward to discussing this renewal application with you.

Thank you for your consideration.

Very truly yours,

Marina Liacouras Phillips

Marina Liacouras Phillips

cc: Mr. Bill Espich (w/enc.)
Brandt C. Everhart, Esq. (w/enc.)

Please submit this completed form with your application
Maintenance fee billing will be sent using this information

Permit Maintenance Fee Information

(1) Facility Name: Associated Naval Architects, Inc.
(Please indicate all facility names applicable for the information listed below)

(2) Permit Number(s):
VA0087599
(Please indicate all VPDES individual permit numbers applicable for the information listed below)

(3) Tax Payer ID [FIN]: 540484088

(4) Billing Information:

Corporate Name or Owner Name: Associated Naval Architects, Inc.

Corporate Billing Address or Owner Address: 3400 Shipwright Street
Portsmouth, VA 23703

(5) Billing Contact:

Name, Title: M. V. Craft, President

Phone Number: (757) 484-5320

E-mail Address: billcraft@anashipyard.com

Thomas,Carl

From: Phillips, Marina L. [mlphillips@kaufcan.com]
Sent: Friday, June 13, 2008 11:05 AM
To: Thomas,Carl
Subject: Associated Naval Architects Permit Renewal

Document.pdf (116 KB)

Carl: Attached please find the data on the COD and BOD for the process waster water at outfall #3 that was not provided with the application. I know that you said it could be tested at the next sampling event, but ANA went ahead and got the sample. Please let me know if I can be of further assistance, MLP

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

TELEPHONE: (757) 865-0000
TOLL-FREE: (800) 845-2782
FAX: (757) 865-0864

REPORT OF ANALYSIS

Order ID: 0806083

(REPORT DATE)
12-Jun-08

TO: ASSOCIATED NAVAL ARCHITECTS, INC
3400 SHIPWRIGHT STREET
PORTSMOUTH VA 23703
ATTN: Brandt Everhart

Project ID: N/A
Project # N/A
Site: OF-003 Grab
Matrix: Wastewater

UL Sample Number: 0806083-001
Sample ID: OF-003 Grab
Grab Date/Time: 6/5/2008 11:15
Composite Start: N/A
Composite Stop: N/A
Collected By: newjoh

Comments for Order:

Parameter	Method	Test Result	Units	UL Report Limit	Analysis Date/Time	Analyst
Chemical Oxygen Demand	HACH 8000	167	mg/L	10	6/10/2008 08:55:00	AB
BOD5	SM-5210	22	mg/L	2	6/6/2008 17:15:00	LW

Comments for Sample ID 0806083-001:
No comments

Respectfully Submitted,

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51708
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0806083-001

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

TELEPHONE: (757) 865-0880
TOLL-FREE: (800) 695-2162
FAX: (757) 865-8014

REPORT OF ANALYSIS

Order ID: 0806083

(REPORT DATE)
12-Jun-08

TO: ASSOCIATED NAVAL ARCHITECTS, INC
3400 SHIPWRIGHT STREET
PORTSMOUTH VA 23703
ATTN: Brandt Everhart

UL Sample Number: 0806083-001
Sample ID: OF-003 Grab
Grab Date/Time: 6/5/2008 11:15
Composite Start: N/A
Composite Stop: N/A
Collected By: newjoh

Project ID: N/A
Project #: N/A
Site: OF-003 Grab
Matrix: Wastewater
Comments for Order:

Parameter	Method	Test Result	Units	UL Report Limit	Analysis Date/Time	Analyst
Chemical Oxygen Demand	HACH 8000	167	mg/L	10	6/10/2008 08:55:00	AB
BOD5	SM-5210	22	mg/L	2	6/6/2008 17:15:00	LW

Comments for Sample ID 0806083-001
*No comments

Respectfully Submitted,

 Virginia Drinking Water Lab# 00030 North Carolina Drinking Water Lab # 51700 EPA LAB CODE VA00912 0806083-001
VDEQ Lab #000003 North Carolina Wastewater/Groundwater Lab # 643

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved. OMB No. 2040-0086. Approval expires 5-31-92.

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F V A D 0 0 3 1 7 4 8 8 5 | V/A: . | C: D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: A S S O C I A T E D N A V A L A R C H I T E C T S I N C O R P O R A T E D

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2: E S P E I C H B I L L V P O P E R A T I O N S	7 5 7 | 4 8 4 | 5 3 2 0

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3: 3 4 0 0 S H I P W R I G H T S T R E E T

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4: P O R T S M O U T H	V A	2 3 7 0 3

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5: 3 4 0 0 S H I P W R I G H T S T R E E T

B. COUNTY NAME

N/A

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
P O R T S M O U T H	V A	2 3 7 0 3	N/A

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3731 (specify) ship repair	3732 (specify) boat repair
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: ASSOCIATED NAVAL ARCHITECTS INCORPORATED

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE
P (specify)

D. PHONE (area code & no.): A 757 484 5320

E. STREET OR P.O. BOX: 3400 SHIPWRIGHT STREET

F. CITY OR TOWN: B PORTSMOUTH

G. STATE: VA **H. ZIP CODE:** 23703

IX. INDIAN LAND
Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N VA0087599	9 P 7-40-00069
B. UIC (Underground Injection of Fluids)	**E. OTHER (specify)**
9 U N/A	9 N/A (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER (specify)**
9 R N/A	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. SEE SITE MAP ATTACHED.

XII. NATURE OF BUSINESS (provide a brief description)

Ship and boat repair:

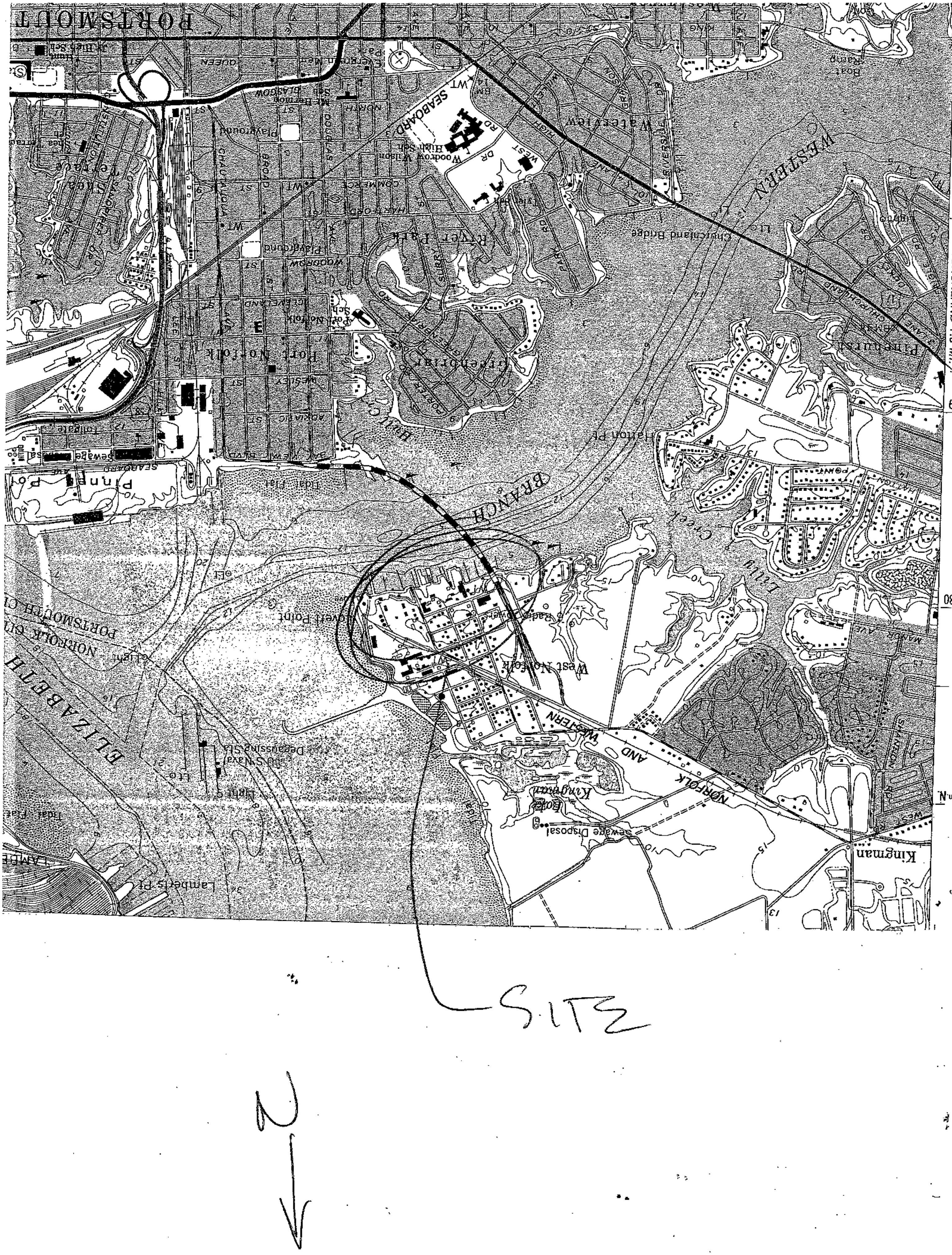
Associated Naval Architects, Inc. drydocks and repairs tugboats, barges, utility, small passenger and similar vessels, commercial and government-owned. Operations include metal work, abrasive blasting and painting machine shop work, piping repairs, electrical repairs and carpentry. Associated Naval Architects, Inc. is a small quantity generator of hazardous waste consisting of waste paint used in boat repair operations. See Facility Process Activities Attached.

XIII. CERTIFICATION (see instructions)

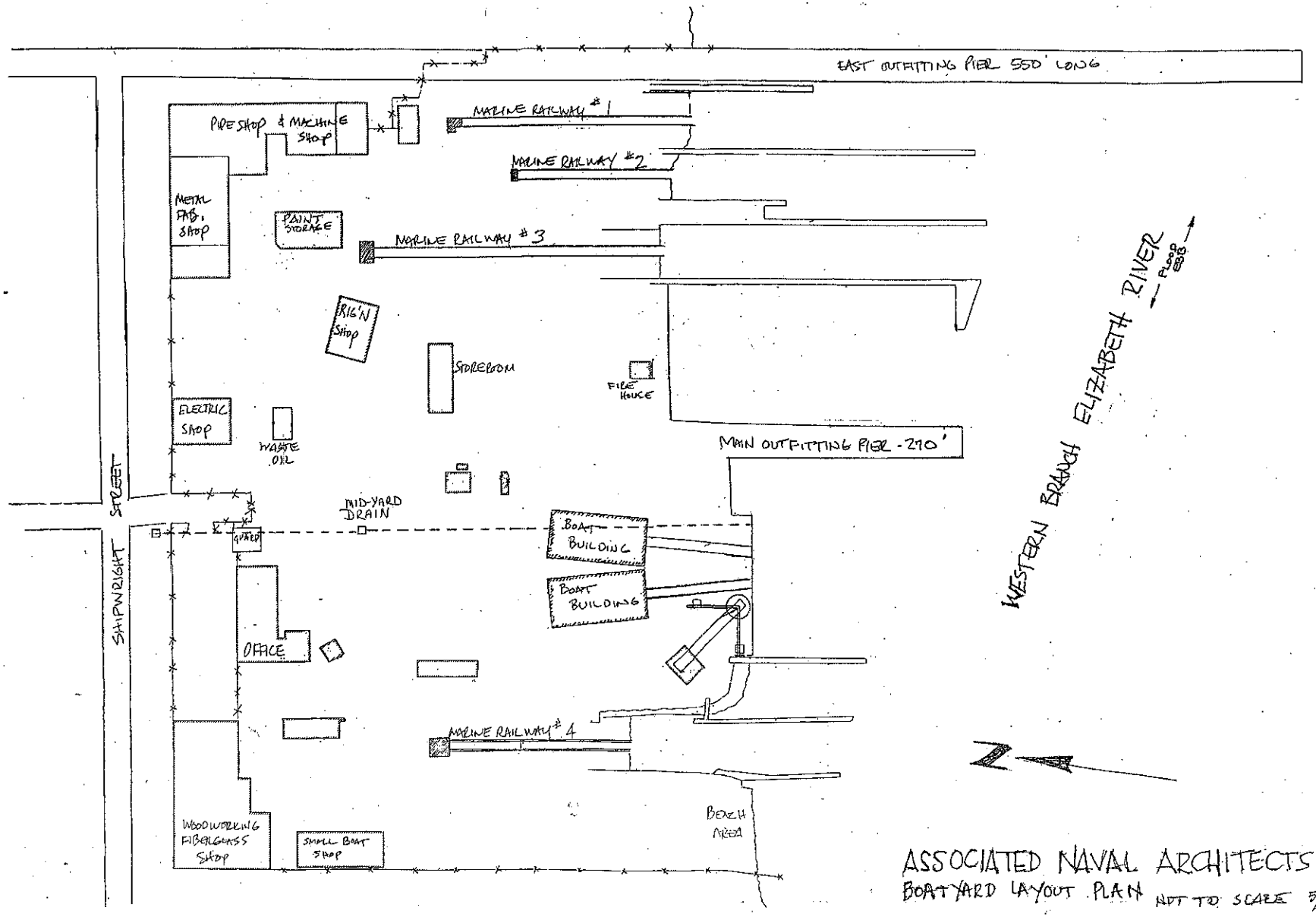
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
M. V. Graft, President		5/23/08

COMMENTS FOR OFFICIAL USE ONLY



PORTSMOUTH
Port Norfolk
West Norfolk
River Park
Waterview
Woodrow Wilson High Sch
Churchland Bridge
Pinehurst
BRANCH
NORFOLK AND WESTERN
Kingman
Sewage Disposal
U S Naval Degaussing Sta
ELIZABETH
Lamberts Pt
NEWPORT NEWS 24 MI.
CHURCHLAND 1.8 MI.
SITE
N



ASSOCIATED NAVAL ARCHITECTS
BOATYARD LAYOUT PLAN NOT TO SCALE 5/21/08

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

TELEPHONE: (757) 865-0880
TOLL-FREE: (800) 695-2162
FAX: (757) 865-8014

Lila (0043, P-pm)

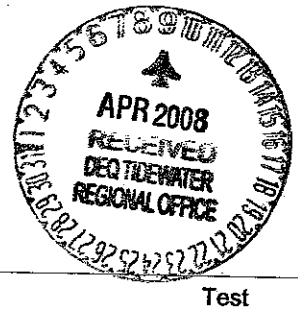
REPORT OF ANALYSIS

Order ID: 0801352

(REPORT DATE)
29-Feb-08

TO: **ASSOCIATED NAVAL ARCHITECTS, INC**
3400 SHIPWRIGHT STREET
PORTSMOUTH VA 23703
ATTN: Brandt Everhart

Project ID: VPDES WQM
Project # VA0087599
Site: OF-003 WQM
Matrix: Wastewater
Comments for Order:



UL Sample Number: **0801352-001**
Sample ID: OF-003 WQM
Grab Date/Time: 2/7/2008 09:45
Composite Start: N/A
Composite Stop: N/A
Collected By: calmik

Parameter	Method	Test Result	Units	UL Report Limit	Analysis Date/Time	Analyst
Dioxin	EPA 1613	**See Attached**	pg/L		2/16/2008 22:25:00	SUB
Antimony (dissolved)	EPA 200.7	<	mg/L	0.005	2/11/2008 19:38:00	CC
Cadmium (Dissolved)	EPA 200.7	**0.005**	mg/L	0.005	2/11/2008 19:38:00	CC
Copper (dissolved)	EPA 200.7	**0.012**	mg/L	0.001	2/11/2008 19:38:00	CC
Lead (dissolved)	EPA 200.7	<	mg/L	0.005	2/11/2008 19:38:00	CC
Nickel (Dissolved)	EPA 200.7	<	mg/L	0.005	2/11/2008 19:38:00	CC
Selenium (Dissolved)	EPA 200.7	<	mg/L	0.013	2/11/2008 19:38:00	CC
Silver (Dissolved)	EPA 200.7	<	mg/L	0.008	2/11/2008 17:11:00	EF
Zinc (dissolved)	EPA 200.7	**0.328**	mg/L	0.005	2/11/2008 19:38:00	CC
Ammonia	EPA 350.1	**16.0**	mg/L	0.2	2/8/2008 15:05:00	AK
Nitrate	EPA 353.2	**0.36**	mg/L	0.1	2/7/2008 14:17:00	AK
4,4'-DDD	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
4,4'-DDE	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
Alpha-BHC	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
Beta-BHC	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
Endrin Aldehyde	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0801352-001

Heptachlor Epoxide	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
Aldrin	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Chloropyriphos (Dursban)	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
Chlordane	EPA 608	<	ug/L	0.2	2/13/2008 17:07:00	JA
4,4'-DDT	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Demeton	EPA 608	<	ug/L	10	2/13/2008 17:07:00	JA
Dieldrin	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Endosulfan I	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Endosulfan II	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Endosulfan Sulfate	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Endrin	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Guthion	EPA 608	<	ug/L	1	2/13/2008 17:07:00	JA
Heptachlor	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Lindane	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Malathion	EPA 608	<	ug/L	0.04	2/13/2008 17:07:00	JA
Methoxychlor	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
Mirex	EPA 608	<	ug/L	0.2	2/13/2008 17:07:00	JA
Parathion	EPA 608	<	ug/L	0.1	2/13/2008 17:07:00	JA
PCB-1016	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA
PCB-1221	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA
PCB-1232	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA
PCB-1248	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA
PCB-1254	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA
PCB-1260	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA
PCB-1242	EPA 608	<	ug/L	0.5	2/13/2008 17:07:00	JA

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0801352-001

Toxaphene	EPA 608	<	ug/L	1	2/13/2008 17:07:00	JA
Kepone	EPA 608	<	ug/L	1	2/13/2008 17:07:00	JA
Benzene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Bromoform	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Carbon Tetrachloride	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Dibromochloromethane	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Chloroform	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Chloromethane	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Methylene Chloride	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Bromodichloromethane	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
1,2-Dichloroethane	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Ethyl Benzene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Chlorobenzene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Tetrachloroethene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Toluene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Trichloroethene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Vinyl Chloride	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Total Xylenes	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
1,1-Dichloroethylene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Monochlorobenzene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Trichloroethylene	EPA 624	<	ug/L	1	2/11/2008 22:33:00	RP
Acrolein	EPA 624	<	ug/L	100	2/11/2008 22:33:00	RP
Acrylonitrile	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP
1,2-Dichloroethene (total)	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP
1,2-Dichloropane	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0801352-001

1,3-Dichloropropane	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP
Bromomethane	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP
1,1,2,2-Tetrachloroethane	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP
1,1,2-Trichloroethane	EPA 624	<	ug/L	5	2/11/2008 22:33:00	RP
Benzo(a)anthracene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Benzo(b)fluoranthene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Benzo[k]fluoranthene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Benzo [a]pyrene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Chrysene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Dibenzo(a,h)anthracene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
1,2-Dichlorobenzene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
1,3,-Dichlorobenzene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
1,4-Dichlorobenzene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2,4-Dinitrotoluene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Bis(2-ethylhexyl) Phthalate	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Fluoranthene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Fluorene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Isophorone	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Indeno(1,2,3-cd)pyrene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Naphthalene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Pyrene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Pentachlorophenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Phenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2,4,6-Trichlorophenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Anthracence	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0801352-001

Acenaphthene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Di-n-butyl Phthalate	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2,4-Dichlorophenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2,4-Dimethylphenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2-Chlorophenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Nitrobenzene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
1,2,4-Trichlorobenzene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Butyl Benzyl Phthalate	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Diethyl Phthalate	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Benzidine	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Bis(2-chloroethyl) Ether	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Bis(2-chloroisopropyl) Ether	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2-Chloronaphthalene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
3,3'-Dichlorobenzidine	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Dimethyl Phthalate	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
1,2-Diphenylhydrazine	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Hexachlorobenzene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Hexachlorobutadiene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Hexachlorocyclopentadiene	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
Hexachloroethane	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
N-Nitrosodimethylamine	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
N-Nitrosodi-n-propylamine	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
N-Nitrosodiphenylamine	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2,4-Dinitrophenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM
2-Methyl-4,6-dinitrophenol	EPA 625	<	ug/L	5	2/8/2008 17:41:00	JM

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0801352-001

TBT Tributyltin	GC/FPD	<	ng/l	30	2/12/2008 11:56:00	JA
Hardness as CaCO3-EDTA	SM-2340 C	**100**	mg/L	2	2/12/2008 15:05:00	AB
Mercury (Dissolved)	SM-3112 B	<	mg/L	0.0002	2/11/2008 10:46:00	EF
Arsenic III	SM-3500 As/D	<	mg/L	0.005	2/11/2008 19:38:00	CC
Hexavalent Chromium (Dissolv	SM-3500 Cr/D	<	mg/L	0.005	2/7/2008 14:33:00	EF
Field Residual Chlorine	SM-4500 CL/G	**0.71**	mg/L	0.1	2/7/2008 09:51:00	MC
Total Cyanide	SM-4500 CN/C/E	**0.014**	mg/L	0.005	2/13/2008 10:47:00	EG
Sulfide	SM-4500 S2/E	**1.30**	mg/L	0.04	2/13/2008 13:43:00	EG
Fecal Coliform	SM-9222 D	**7**	CFU/100mL	1	2/7/2008 14:32:00	AB

Comments for Sample ID 0801352-001

No comments

Respectfully Submitted,

APR 2008
RECEIVED
DEQ TIDEWATER
REGIONAL OFFICE

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912

0801352-001

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Universal Laboratories	**Service Request:**	E0800139
Project:	Method 1613/0801352	**Date Collected:**	02/07/2008
Sample Matrix:	Water	**Date Received:**	02/13/2008
Sample Name:	OF-003 WQM	**Units:**	pg/L
Lab Code:	E0800139-001	**Basis:**	NA

Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans by HRGC/HRMS

Analyte Name	Result	DL	Dilution Factor	TEF	TEF - Adjusted Concentration
2,3,7,8-TCDD	ND	0.161	1	1	
1,2,3,7,8-PeCDD	ND	0.260	1	0.5	
1,2,3,4,7,8-HxCDD	ND	0.375	1	0.10	
1,2,3,6,7,8-HxCDD	ND	0.398	1	0.10	
1,2,3,7,8,9-HxCDD	**1.22**	0.361	1	0.10	0.122
1,2,3,4,6,7,8-HpCDD	**37.7**	0.606	1	0.01	0.377
OCDD	**333**	0.264	1	0.001	0.333
2,3,7,8-TCDF	ND	0.186	1	0.1	
1,2,3,7,8-PeCDF	ND	0.322	1	0.05	
2,3,4,7,8-PeCDF	ND	0.314	1	0.5	
1,2,3,4,7,8-HxCDF	**0.839**	0.237	1	0.1	0.0839
1,2,3,6,7,8-HxCDF	ND	0.270	1	0.1	
1,2,3,7,8,9-HxCDF	ND	0.294	1	0.1	
2,3,4,6,7,8-HxCDF	**0.763**	0.241	1	0.1	0.0763
1,2,3,4,6,7,8-HpCDF	**5.51**	0.304	1	0.01	0.0551
1,2,3,4,7,8,9-HpCDF	ND	0.381	1	0.01	
OCDF	**17.8**	0.420	1	0.001	0.0178
		Total TEQ			1.07

EPA TEFs, ND = 0

Comments:

U801352

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Universal Laboratories	**Service Request:**	E0800139
Project:	Method 1613/0801352	**Date Collected:**	02/07/2008
Sample Matrix:	Water	**Date Received:**	02/13/2008
Sample Name:	OF-003 WQM	**Units:**	pg/L
Lab Code:	E0800139-001	**Basis:**	NA

Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans by HRGC/HRMS

Analytical Method:	1613B	**Date Analyzed:**	2/16/08 22:25:00
Prep Method:	Method	**Date Extracted:**	2/13/08
Sample Amount:	970mL	**Instrument Name:**	E-HRMS-02
		GC Column:	DB-5
Data File Name:	U214144	**Blank File Name:**	U214141
ICAL Name:	04/13/07	**Cal Ver. File Name:**	U214138

Analyte Name	Result	Q	EDL	MRL	Ion Ratio	RRT	Dilution Factor
2,3,7,8-TCDD	ND	U	0.161	10.3			1
1,2,3,7,8-PeCDD	ND	U	0.260	51.5			1
1,2,3,4,7,8-HxCDD	ND	U	0.375	51.5			1
1,2,3,6,7,8-HxCDD	ND	U	0.398	51.5			1
1,2,3,7,8,9-HxCDD	**1.22**	J	0.361	51.5	1.11	1.009	1
1,2,3,4,6,7,8-HpCDD	**37.7**	JB	0.606	51.5	1.05	1.000	1
OCDD	**333**	B	0.264	103	0.86	1.000	1
2,3,7,8-TCDF	ND	U	0.186	10.3			1
1,2,3,7,8-PeCDF	ND	U	0.322	51.5			1
2,3,4,7,8-PeCDF	ND	U	0.314	51.5			1
1,2,3,4,7,8-HxCDF	**0.839**	JK	0.237	51.5	1.47	1.000	1
1,2,3,6,7,8-HxCDF	ND	U	0.270	51.5			1
1,2,3,7,8,9-HxCDF	ND	U	0.294	51.5			1
2,3,4,6,7,8-HxCDF	**0.763**	J	0.241	51.5	1.34	1.000	1
1,2,3,4,6,7,8-HpCDF	**5.51**	J	0.304	51.5	0.99	1.000	1
1,2,3,4,7,8,9-HpCDF	ND	U	0.381	51.5			1
OCDF	**17.8**	J	0.420	103	0.86	1.004	1
Total Tetra-Dioxins	ND	U	0.161	10.3			1
Total Penta-Dioxins	ND	U	0.260	51.5			1
Total Hexa-Dioxins	**20.2**	J	0.375	51.5	1.23		1
Total Hepta-Dioxins	**259**		0.606	51.5	1.05		1
Total Tetra-Furans	ND	U	0.186	10.3			1
Total Penta-Furans	ND	U	0.314	51.5			1
Total Hexa-Furans	**7.90**	J	0.237	51.5	1.37		1
Total Hepta-Furans	**12.4**	J	0.304	51.5	0.99		1

Comments:

COLUMBIA ANALYTICAL SERVICES, INC.

Analytical Report

Client:	Universal Laboratories	**Service Request:**	E0800139
Project:	Method 1613/0801352	**Date Collected:**	02/07/2008
Sample Matrix:	Water	**Date Received:**	02/13/2008
Sample Name:	OF-003 WQM	**Units:**	pg/L
Lab Code:	E0800139-001	**Basis:**	NA

Polychlorinated Dibenzodioxins and Polychlorinated Dibenzofurans by HRGC/HRMS

Analytical Method:	1613B	**Date Analyzed:**	2/16/08 22:25:00
Prep Method:	Method	**Date Extracted:**	2/13/08
Sample Amount:	970mL	**Instrument Name:**	E-HRMS-02
		GC Column:	DB-5
Data File Name:	U214144	**Blank File Name:**	U214141
ICAL Name:	04/13/07	**Cal Ver. File Name:**	U214138

Labeled Compounds	Spike Conc.(pg)	Conc. Found (pg)	%Rec	Q	Control Limits	Ion Ratio	RRT
C13-2,3,7,8-TCDD	2000	1964.604	98		25-164	0.78	1.008
C13-1,2,3,7,8-PeCDD	2000	1983.199	99		25-181	1.56	1.173
C13-1,2,3,4,7,8-HxCDD	2000	1826.063	91		32-141	1.27	0.990
C13-1,2,3,6,7,8-HxCDD	2000	2224.300	111		28-130	1.28	0.992
C13-1,2,3,4,6,7,8-HpCDD	2000	1685.908	84		23-140	1.05	1.072
C13-OCDD	4000	2690.196	67		17-157	0.90	1.157
C13-2,3,7,8-TCDF	2000	1677.689	84		24-169	0.80	0.978
C13-1,2,3,7,8-PeCDF	2000	1983.902	99		24-185	1.58	1.134
C13-2,3,4,7,8-PeCDF	2000	1864.483	93		21-178	1.56	1.160
C13-1,2,3,4,7,8-HxCDF	2000	1794.603	90		26-152	0.53	0.970
C13-1,2,3,6,7,8-HxCDF	2000	1782.065	89		26-123	0.53	0.973
C13-1,2,3,7,8,9-HxCDF	2000	1984.420	99		29-147	0.52	1.006
C13-2,3,4,6,7,8-HxCDF	2000	1891.417	95		28-136	0.52	0.987
C13-1,2,3,4,6,7,8-HpCDF	2000	1731.104	87		28-143	0.45	1.047
C13-1,2,3,4,7,8,9-HpCDF	2000	1808.764	90		26-138	0.45	1.083
CL37-2,3,7,8-TCDD	800	793.892	99		35-197	NA	1.008

Comments:

Universal Laboratories

20 Research Drive Hampton, Va.
Phone: (757)-865-0880 Fax: (757) 865-8014

EXPRESS LOG-IN CHAIN OF CUSTODY

UL ORDER ID **0801352**

Order Comment:

Pre-Log Date: Friday, January 25, 2008

Samples Must Be Received on or Before:

ANA ASSOCIATED NAVAL ARCHITECTS, INC **ProjectID:** VPDES WQM **QuoteID:** Q0801018

3400 SHIPWRIGHT STREET **Permit Number:** VA0087599

PORTSMOUTH VA 23703 **Project Notes:** **ProjectLocation:**

Customer Contact: Brandt Everhart

Phone Number: (757)484-5320

FaxNumber: (757)483-1386

)1352-001 **Outfall** **Sample Date/Time** 2/7/08 09:45 **Sampler Initials** CAL

Field Reading

								Container Type	Preservative
Wastewater	EPA 161	Total Dioxin	EPA 608	Chlorinated Pesticides (WQM List)	EPA 625	Semi-Volatile Organic Compounds (WQM)		Amber Glass	Refrigerate, 4 C
	HS	Sulfide						HDPE	2N zinc acetate/NaOH pH
	CR6D	Hexavalent Chromium (Dissolved)						HDPE	Filter and Refrigerate, 4 C
	NH3	Ammonia						HDPE	H2SO4 pH<2/4C
	HRD	Hardness as CaCO3-EDTA						HDPE	HNO3 pH<2
	CN	Total Cyanide						HDPE	NaOH pH>12
	NO3	Nitrate						HDPE	Refrigerate, 4 C
	AGID	Silver (Dissolved)	AS3D	Arsenic III (Dissolved)	CDID	Cadmium (Dissolved)	CUID Copper (Dissolved)	HDPE (acid wash	Filter HNO3 ph<2
	HGD	Dissolved Mercury	NIID	Nickel (Dissolved)	PBID	Lead (Dissolved)	SBID Antimony (Dissolved)		
	SEID	Selenium (Dissolved)	ZNID	Zinc (Dissolved)		Filtered On Site			
	RCL2	Field Residual Chlorine						N/A	N/A
	TBT	TBT Tributyltin						Polycarbonate	HCL pH< 2/4C
	FCMF	Fecal Coliform (MF)						Sterile	Na2S2O3/4C
	EPA 624	Volatile Organic Compounds (WQM)						VOA	HCL pH<2/Ascorbic acid (i

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APR 2008 RECEIVED WASTEWATER REGIONAL OFFICE

0801352-002 **Field Services** **Sample Date/Time** 2/7/08 **Sampler Initials** CAL

Field Reading

							Container Type	Preservative
Field Services	FILTER	Filtration Apparatus	GRAB	Grab Sample	~~TRANS~~	Transportation	N/A	N/A

x2

ANA ASSOCIATED NAVAL ARCHITECTS, INC

3400 SHIPWRIGHT STREET
PORTSMOUTH VA 23703

ProjectID: VPDES WQM

Project Notes:

QuoteID: Q0801018
Permit Number: VA0087599
ProjectLocation:

Customer Contact: Brandt Everhart

Phone Number: (757)484-5320
FaxNumber: (757)483-1386

Comments:

Cooler Temp @ Log-in 4°C 2.7/2

Preservation

CN int check Five 9 Phenol In check NH3 int check BOD int check

Relinquished By Signature:	***Company:***	***Date/Time:*** 2/7/08 1242
Received By Signature:	***Company:***	***Date/Time:*** 2/7/08 1242
linquished By Signature:	***Company:***	***Date/Time:***
Received By Signature:	***Company:***	***Date/Time:***
Relinquished By Signature:	***Company:***	***Date/Time:***
Received By Signature:	***Company:***	***Date/Time:***

APR 2008
RECEIVED
DEQ TIDEWATER
REGIONAL OFFICE

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666
1-800-695-2162
(757) 865-0880
Fax: (757) 865-8014
E-mail: Info@universallaboratories.net

Date: Friday, February 29, 2008

Pages: Page 1 of 7

To: Brandt Everhart
ASSOCIATED NAVAL ARCHITECTS, INC

Fax#: (757)483-1386

From: Mike Jennings

Subject: Results for Project VPDES WQM
designated as UL Order Id 0801352 and received on Thursday, February 07, 2008

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003
North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543
EPA LAB CODE VA00912
0801352-001

Please print or type in the unshaded areas only

EPA ID Number *(copy from Item I of Form 1)*: VAD003174835

Form Approved. OMB No. 2040-0086
Approval expires 5-31-92

Form 2F NPDES

EPA

United States Environmental Protection Agency
Washington, DC 20460

Application for Permit To Discharge Stormwater Discharges Associated with Industrial Activity

I. Outfall Location

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. Outfall Number *(list)*	B. Latitude			C. Longitude			D. Receiving Water *(name)*
901	36	51	34	76	20	41	Western Branch Elizabeth River
902	36	51	34	76	20	41	Western Branch Elizabeth River
903	36	51	33	76	20	42	Western Branch Elizabeth River
904	36	51	32	76	20	47	Western Branch Elizabeth River
Mid-yard Drain	36	51	34	76	20	42	Western Branch Elizabeth River

II. Improvements

A. Are you now required by any Federal, State, or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions. No.

1. Identification of Conditions, Agreements, Etc.	2. Affected Outfalls		3. Brief Description of Project	4. Final Compliance Date	
	number	source of discharge		a. req.	b. proj.

B. You may attach additional sheets describing any additional water pollution (or other environmental projects which may affect your discharges) you now have under way or which you plan. Indicate whether each program is now under way or planned, and indicate your actual or planned schedules for construction.

III. Site Drainage Map

Attach a site map showing topography (or indicating the outline of drainage areas served by the outfall(s) covered in the application if a topographic map is unavailable) depicting the facility including: each of its intake and discharge structures; the drainage area of each storm water outfall; paved areas and buildings within the drainage area of each storm water outfall, each known past or present areas used for outdoor storage or disposal of significant materials, each existing structural control measure to reduce pollutants in storm water runoff, materials loading and access areas, areas where pesticides, herbicides, soil conditioners and fertilizers are applied; each of its hazardous waste treatment, storage or disposal units (including each area not required to have a RCRA permit which is used for accumulating hazardous waste under 40 CFR 262.34); each well where fluids from the facility are injected underground; springs, and other surface water bodies which receive storm water discharges from the facility.

Continued from the Front

IV. Narrative Description of Pollutant Sources

A. For each outfall, provide an estimate of the area (include units) of impervious surfaces (including paved areas and building roofs) drained to the outfall, and an estimate of the total surface area drained by the outfall.

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
901	0	8,000 sq. ft.	903	0	9,000 sq. ft.
902	0	3,000 sq. ft.	904 Mid-yard drain	0	3,600 sq. ft.

B. Provide a narrative description of significant materials that are currently or in the past three years have been treated, stored or disposed in a manner to allow exposure to storm water; method of treatment, storage, or disposal; past and present materials management practices employed, in the last three years, to minimize contact by these materials with storm water runoff; materials loading and access areas; and the location, manner, and frequency in which pesticides, herbicides, soil conditioners, and fertilizers are applied.

Associated Naval Architects generates waste paint on a regular basis and abrasive blast material on an irregular basis. Waste paint is either dried and hardened and disposed of as solid waste, or, if liquid, it is disposed of as hazardous waste. Abrasive blast material is returned to its source, Virginia Materials, for recycling.

C. For each outfall, provide the location and a description of existing structural and nonstructural control measures to reduce pollutants in storm water runoff; and a description of the treatment the storm water receives, including the schedule and type of maintenance for control and treatment measures and the ultimate disposal of any solid or fluid wastes other than by discharge.

Outfall Number	Treatment	List Codes from Table 2F-1
901 - 904	See Facility Process Activities summary attached to Form 1 Part XII.	4A
Mid-yard drain		4A

V. Nonstormwater Discharges

A. I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of nonstormwater discharges, and that all nonstormwater discharges from these outfall(s) are identified in either an accompanying Form 2C or Form 2E application for the outfall.

Name and Official Title (type or print)	Signature	Date Signed
M. V. Craft, President	MV Craft	5/23/08

B. Provide a description of the method used, the date of any testing, and the onsite drainage points that were directly observed during a test.

Storm water discharge drainage has been evaluated by visual observation, familiarity with facility and processes, by trained staff. BMPs ensure separation of storm and process waters.

VI. Significant Leaks or Spills

Provide existing information regarding the history of significant leaks or spills of toxic or hazardous pollutants at the facility in the last three years, including the approximate date and location of the spill or leak, and the type and amount of material released.

On March 29,2005, minor amounts of free product were observed in an open excavation area. An above ground used oil tank was formerly located in the area and is assumed to be the source of the release. The actual date and amount of the release is unknown. The release area is located juse east of ANA's main pier, approximately 20' from the Elizabeth River. The case was closed by the DEQ on April 22, 2008.

 Continue on Page 3

Mid-yard Drain

EPA ID Number *(copy from Item I of Form 1)*
VAD003174885

Form Approved. OMB No. 2040-0086
Approval expires 5-31-92

VII. Discharge Information *(Continued from page 3 of Form 2F)*

Part A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite		
Oil and Grease			N.D.		1	
Biological Oxygen Demand (BOD5)			N.D.		1	
Chemical Oxygen Demand (COD)			N.D.		1	
Total Suspended Solids (TSS)			4.4 mg/L		1	
Total Kjeldahl Nitrogen			0.3 mg/L		1	
Nitrate plus Nitrite Nitrogen			0.96 mg/L		1	
Total Phosphorus			N.D.		1	
pH	Minimum	Maximum	Minimum	Maximum		

Part B - List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite		
copper			0.026 mg/L		1	
zinc			0.102 mg/L		1	

Continued from the Front

Part C - List each pollutant shown in Tables 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

Pollutant and CAS Number *(if available)*	Maximum Values *(include units)*		Average Values *(include units)*		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-weighted Composite		

Part D - Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm *(in minutes)*	3. Total rainfall during storm event *(in inches)*	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum floe rate during rain event *(gallons/minute or specify units*	6. Total flow from rain event *(gallons or specify units)*	7. Season sample was taken	8. Form of Precipitation *(rainfall, snowmelt)*
4/21/08 through 4/23/08		2.33"	6 days	Estimated 1400 GPD		Spring	Rainfall

9. Provide a description of the method of flow measurement or estimate.

TELEPHONE: (757) 865-0880
TOLL-FREE: (800) 695-2152
FAX: (757) 865-8014

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

REPORT OF ANALYSIS

Order ID: 0804282

(REPORT DATE)
29-Apr-08

TO: **ASSOCIATED NAVAL ARCHITECTS, INC**
3400 SHIPWRIGHT STREET
PORTSMOUTH VA 23703
ATTN: Jim Axley

Project ID: N/A
Project # N/A
Site: Preliminary Stormwater
Matrix: Stormwater

UL Sample Number: **0804282-001**
Sample ID: Preliminary Stormwater
Grab Date/Time: 4/21/2008 09:00
Composite Start: N/A
Composite Stop: N/A
Collected By: Client

Comments for Order:

Parameter	Method	Test Result	Units	UL Report Limit	Analysis Date/Time	Analyst
Copper (dissolved)	EPA 200.7	**0.026**	mg/L	0.001	4/28/2008 11:33:00	CC
Zinc (dissolved)	EPA 200.7	**0.102**	mg/L	0.005	4/28/2008 11:33:00	CC
Mysidopsis Bahia	EPA 600/4-90/027	**See Attached**			4/24/2008	SUB
Cyprinodon Variegatus 48hrs	EPA600/4-90-027	**See Attached**			4/24/2008	SUB
Flow Rate	Estimated/Measured	**0.0014**	mgd	0.0001	4/21/2008 09:00:00	C
Total Suspended Solids	SM-2540 D	**4.4**	mg/L	1	4/22/2008 12:45:00	AK

Comments for Sample ID 0804282-001
No comments

Respectfully Submitted,
Carol Kleeman

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912 0804282-001

CBI
Coastal Bioanalytic, Inc.

0804282

FAX MESSAGE

TO: Name: *Geof Hinshelwood*

Company: *Universal Laboratories*

Date: *4-24-08*

FAX No.: *757-865-8014*

No. Pages: 1

FROM: Name: *Pete De Lisle*

Re: Preliminary toxicity test results ANA, 4/21/08 sample

ACUTE WHOLE EFFLUENT TOXICITY TESTS:

Test Method	Endpoint	LC50 (%)	NOAEC (%)	TU_A
Mysidopsis bahia 48-h Acute Test (EPA Method # 2007.0)	Survival	>100	N/A	<1.00
Cyprinodon variegatus 48-h Acute Test (EPA Method # 2004.0)	Survival	>100	N/A	<1.00

Full final reports to follow soon. These results are preliminary.

6400 Enterprise Court, Gloucester, VA 23061
Phone 804-694-8285 Fax 804-695-1129 cbi@coastalbio.com

CHAIN-OF-CUSTODY

UNIVERSAL LABORATORIES

20 Research Drive
Hampton, VA 23666

Phone: (757) 865-0880
Fax: (757) 865-8014

Company	ANA
Street/Box	
City/State	
Phone	Fax
Contact:	
Job No.	P.O. No.

Analysis Required

Sample ID	Date/Time	Sampled By	Matrix	Sample Type	Field Notes	Preservative COD + ZNID	Preservative TSS	Preservative Mysid/Sheep	Preservative pH	Preservative Flow Rt 1 gpm	Preservative	Preservative	Preservative	Lab Number
Preliminary Stormwater	4-21-08 0900	dint	STMW	C (G)										0804282
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										

Comments:

Cooler Temp at LI 2°C Pres √ <2

Possible Hazards:

Disposal: Lab ☐ Client ☐ Charge ☐

Due Date: ______

Express Service ______

Express Service Approval ______

Relinquished By	Signature [signature]	Company ANA	Date/Time 4-21-08 1315
Received By	Signature [signature]	Company UL	Date/Time 4/21/08 1315
Relinquished By	Signature [signature]	Company UL	Date/Time 4/21/08 1385
Received By	Signature	Company	Date/Time
Relinquished By	Signature	Company	Date/Time
Received By	Signature	Company	Date/Time

Work Order No.

Delivery Order

Trans ☐ P.U. ☐ Grab ☐ Comp ☐

Shipping/Delivery Charges

Composite Start / Composite Stop

TELEPHONE: (757) 865-0880
TOLL-FREE: (800) 898-2162
FAX: (757) 865-8614

UNIVERSAL LABORATORIES

20 Research Drive Hampton, Va 23666

REPORT OF ANALYSIS

Order ID: 0804358

(REPORT DATE)
30-Apr-08

TO: **ASSOCIATED NAVAL ARCHITECTS, INC**
3400 SHIPWRIGHT STREET
PORTSMOUTH VA 23703
ATTN: Jim Axley

Project ID: N/A
Project # N/A
Site: Preliminary Stormwater
Matrix: Stormwater
Comments for Order:

UL Sample Number: 0804358-001
Sample ID: Preliminary Stormwater
Grab Date/Time: 4/23/2008
Composite Start: N/A
Composite Stop: N/A
Collected By: Client

Parameter	Method	Test Result	Units	UL Report Limit	Analysis Date/Time	Analyst
OIL and Grease (HEM)	EPA 1664	<	mg/L	5	4/29/2008 14:20:00	AB
Total Kjeldahl Nitrogen (TKN)	EPA 351.2	0.3	mg/L	0.2	4/24/2008 18:40:00	LS
Nitrate-Nitrite	EPA 353.2	0.96	mg/L	0.1	4/24/2008 11:25:00	LS
Total Phosphorus	EPA 365.1	<	mg/L	0.02	4/24/2008 19:53:00	LS
Chemical Oxygen Demand	HACH 8000	<	mg/L	10	4/25/2008 09:44:00	AB
BOD5	SM-5210	<	mg/L	2	4/24/2008 13:40:00	AK

Comments for Sample ID 0804358-001
No comments

Respectfully Submitted,

Virginia Drinking Water Lab# 00030
VDEQ Lab #000003

North Carolina Drinking Water Lab # 51706
North Carolina Wastewater/Groundwater Lab # 543

EPA LAB CODE VA00912 0804358-001

CHAIN-OF-CUSTODY

UNIVERSAL LABORATORIES

20 Research Drive
Hampton, VA 23666

Phone: (757) 865-0880
Fax: (757) 865-8014

Company	ANA
Street/Box	
City/State	
Phone	Fax
Contact:	
Job No.	P.O. No.

Sample ID	Date/Time	Sampled By	Matrix	Sample Type	Field Notes	Preservative O&T	Preservative BOD	Preservative COD	Preservative TKN NN	Preservative TP	Preservative C2H	Preservative	Preservative	Lab Number
Poe Elm St Water.		client	SOIW	C G		2	1	1	1	1	1			804758
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										
				C G										

Arrayals Required

Comments:

Cooler Temp at Lt 3°C Pres √ < 2

Possible Hazards: Disposal: Lab ☐ Client ☐ Charge ☐

Due Date:

Express Service

Express Service Approval

Relinquished By	Signature	Company ANA	Date/Time
Received By	Signature	Company U	Date/Time 4/23/08 1225
Relinquished By	Signature	Company U	Date/Time 4/23/08 1325
Received By	Signature	Company	Date/Time
Relinquished By	Signature	Company	Date/Time
Received By	Signature	Company	Date/Time

Work Order No.

Delivery Order

Trans☐ P.U.☐ Grab☐ Comp☐

Shipping/Delivery Charges

Composite Start / Composite Stop

Facility Process Activities:

Associated Naval Architects (ANA) is in the business of commercial and government vessel repair. There are four conventional marine railways at the site located on the Western Branch of the Elizabeth River. The principal operations of the shipyard include craft and vessel docking, repair, and preservation and plant maintenance.

The docking procedure requires initial hull cleaning for inspection and repair. Barnacles and marine growth are removed by scraping or hose washing. Saltwater from the ANA Fire and Saltwater Service System is used to wash marine railway tracks, hauling chain, underwater hull surfaces and railway cradles during the docking procedure. Phosphorous is not used by ANA at the marine railways. Waste water generated in this process is diverted, collected, or filtered, to minimize foreign materials entering state waters. Solid waste is handled by Waste Management of Virginia, Inc. or Virginia Materials, Inc.

Vessel repair frequently requires renewal of exterior hull plate and sometimes includes renewing various fluids in the main and auxiliary systems within the vessel. Scrap metal is collected on the ground above the tide line and placed in disposal containers. Scrap metal and other materials are currently handled by Simms Recycling and Waste Management of Virginia, Inc. respectively. Fluids are collected and placed in a waste fluid collection tank. The tank is pumped on request by C & M Industries, Inc.

Preservation includes preparation and coating. Sandblasting a vessel hull to near white metal is required in many of our customer repair specifications. Abrasive blast material is delivered and stored in closed containers. After the blast material is used for its intended purpose, it is handled as a solid waste and returned to Virginia Materials, Inc. for their use or disposal. Abrasive blast material is temporarily collected on ANA property at locations thirty feet or more from the water's edge. It is covered with tarpaulins or similar material for protection until Virginia Materials provides a conveyance for removal. Paint and solvents are normally mixed adjacent to the marine railway or work area. Non-porous materials are placed under the mixing operation. Unused paint and solvent is either suitable for reuse and is returned to the designated storage areas at the end of each paint operation or it is waste. Empty containers, containers with dried product and non-paint waste materials are placed under cover while awaiting disposal. Liquid waste is collected in 55 gallon drums for pickup and disposal by Potomac Environmental, Inc.

Yard maintenance is normally performed on motorized equipment in the repair shop which is covered or adjacent to it on a non-porous surface. Waste petroleum products are collected in the shop and transferred to the waste fluid collection tank for disposal. New and reusable petroleum products are stored under cover throughout the shipyard.

Compliance Assurance:

In order to ensure compliance with all applicable environmental requirements, since January 2008 ANA has taken major steps to improve housekeeping and eliminate issues related to handling of spent abrasive blast material in the yard. ANA's efforts have been recognized by the Department of Environmental Quality as evidenced by the most recent Reconnaissance Inspection Report dated April 2, 2008, attached to this discussion, that documents these improvements. ANA's plan is to prevent spent blast media form entering the water stream. Solid barriers or freeboard behind the bulkhead will be used at each marine railway so that storm water will be diverted from discharging directly into the Elizabeth River. Sand-blasting will not be conducted over the water. Vessels extending over the water will be repositioned end for end to allow sandblasting of the entire hull without performing such work over the water.

Additional measures have been instituted that include: new shrouds installed at Marine Railway #4, spent abrasive blast material removed from each railway at the end of each availability, waste bins placed along each railway, waste fluid collection tank placed in secondary containment under cover, and paint, solvent and lubricant containers stored under cover or indoors.

Review of Events since September 2007

The Virginia Department of Environmental Quality (DEQ) made a Reconnaissance Inspection Report on October 1, 2007 documenting their site inspection of September 20, 2007. DEQ made a second Reconnaissance Inspection Report on November 7, 2007 documenting their follow up site inspection of October 26, 2007. DEQ concluded that company owners and managers were not adequately supporting permit compliance.

In an effort to make a significant difference and an effective change, Associated Naval Architects, Inc. (ANA) management moved the responsibility for Best Management Practices from a staff to a production function and committed to that revised organization in a letter to DEQ date January 8, 2008. Improved housekeeping and spent abrasive blast material removal were immediately instituted by production management and executed by all members of the production team. On March 19, 2008 ANA welcomed DEQ to visit the site for the purposes of introducing ANA management and DEQ inspectors and of making an informal inspection to observe and comment on actions taken to date. The DEQ representatives were impressed with what they saw at the site, as evidenced by the Reconnaissance Inspection Report dated April 2, 2008, a copy of which is attached to this discussion. ANA is going to request another reconnaissance inspection on or before June 19, 2008.

A major topic of the March 19th meeting was spent abrasive blast material removal. The majority of recent material removal has been accomplished since November 2007 and Virginia Materials, Inc. has been the sole contractor involved. The following table shows abrasive blast material quantities and costs for purchase and removal during 2006, 2007 and through March 31, 2008.

	Purchased	Removed	$	Related $
2006	1173.29	6.4	270.62	27,999.20
2007	1938.15	2063.79	84,580.63	49,771.62
2008 through 3/31	512.17	2167.34	87,320.01	28,025.63
Total through 3/31	3623.61	4237.53	172,171.26	105,796.45

1. Purchased and Removed quantities are expressed in 2000 pound tons.
2. $ is the charge by Virginia Materials for processing the spent abrasive blast material.
3. Related $ are cost associated with the removal and maintenance such as state fees, testing, disposal other than Virginia Materials, labor, materials and miscellaneous.

Control of storm water was also discussed during the March 19th visit. ANA is using a combination of solid barriers, site grading and filtration material to direct and control storm water on the site.

Planned Changes:

ANA is in the process of making the following changes to its environmental compliance programs based upon comments made by the DEQ during the March 19, 2008 meeting:

1. Revise BMP Inspection List

ANA's storm water discharge permit contains thirty-one BMPs. They will each be included in the weekly inspection report so that ANA management can easily review compliance with each BMP. DEQ commented that this would assist ANA in preparing its Annual Site Compliance report.

2. Blast Material Record-keeping

Records documenting purchase and disposal of this material are up to date and easily accessible. ANA management will focus upon continuing this record-keeping practice.

3. Update Storm Water Pollution Prevention Plan (SWPPP)

As procedures for compliance with BMPs are developed, they will be incorporated into the SWPPP. Procedures that are outdated will be removed or updated as appropriate.

4. Incorporate terms of last consent agreement into ANA's compliance procedures

The terms of the 2006 consent agreement regarding compliance procedures will be incorporated into the SWPPP/BMP review as appropriate.

5. Confirm that all outfalls are permitted; eliminate or obtain permits for those that are not

All four marine railways are currently covered by the permit. Solid barriers are being used where necessary to redirect meandering streams that attempt to create un-permitted outfalls. The drop-inlet, located in the approximate center of the yard, is included in the permit renewal submittal. It has been outfitted with filtration material to prevent entry of foreign material into state waters.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE
5636 Southern Boulevard, Virginia Beach, Virginia 23462
(757) 518-2000 Fax (757) 518-2103
www.deq.virginia.gov

L. Preston Bryant, Jr
Secretary of Natural Resources

David K. Paylor
Director

Francis L. Daniel
Regional Director

APR 02 2008

Mr. M. V. Craft, President
Associated Naval Architects, Inc.
3400 Shipwright St.
Portsmouth, VA 23703

Re: Reconnaissance Inspection Report
Associated Naval Architects (VA0087599)

Dear Mr. Craft:

Enclosed is a copy of the Reconnaissance inspection report prepared for the inspection conducted on March 19, 2008. There were no recommendations noted for this report. If you have any questions regarding this report, please feel free to contact me at the above address or telephone (757) 518-2185.

Sincerely,

Mark R. Kidd
Environmental Specialist II

Enclosure

cc: DEQ/OWCP: S.G. Stell
DEQ/TRO: File

RECEIVED 4/7/08

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE
5636 SOUTHERN BOULEVARD
VIRGINIA BEACH, VIRGINIA 23462
RECONNAISSANCE INSPECTION REPORT

FACILITY NAME: **Associated Naval Architects**	PERMIT NUMBER: **VA0087599**
FACILITY ADDRESS: **3400 Shipwright St. Portsmouth, VA 23703**	
INSPECTION DATE: **March 19, 2008**	REPORT DATE: **March 24, 2008**
INSPECTOR: **Mark R. Kidd**	REVIEWER: **Kenneth T. Raum** KTR

PRESENT AT INSPECTION: **John Brandt and Paul Smith – DEQ**
Bill Espich, Al Payne, Jim Axeley, and Rick Davis – ANA
Marina Phillips – Kaufman & Canole

GENERAL OBSERVATIONS

This Reconnaissance Inspection was conducted in conjunction with DEQ Enforcement Section staff to assess current site conditions relative to the conditions observed during the inspection performed by Steve Long of DEQ on October 26, 2007.

A site survey was conducted with the assistance of ANA personnel. According to company records, over 2100 tons of spent abrasive blast material (ABM) have been removed from the site, and loading of ABM was observed (Photo 7) during the inspection. Most bulkhead areas were observed to have material removed to a level below the bulkheads (Photos 5 & 10). Drainage along railway #3 (Photo 4) still needs to be addressed. Railway cradles appeared to be free of ABM (Photos 2 &9).The outfitting pier (Photo 6) was free of spent ABM. Railway outfall locations were secured with fresh hay bales (Photos 3&8) or restored to a functional state by the removal of ABM (Photo 1). Improved housekeeping was observed throughout the facility grounds. Waste bins were placed along each railway and work area and trash removal appeared improved. Container management also appeared to have improved since the previous inspection. Paint, solvent and lubricant containers were stored under cover or indoors. A waste oil tank (Photo 11) and oily water tank (Photo 12) had been moved under shelter and placed in secondary containment. The drop inlet located in the center of the facility was protected by hay bales and filter cloth (Photo 13). The addition of this outfall to the Permit was discussed with ANA.

Overall, housekeeping, container management, ABM management and marine railway drainage control had improved since the last inspection.

INSPECTION RECOMMENDATIONS

PHOTOGRAPHS TAKEN? (See next page.)	YES	x	NO		

COPIES:

TIDEWATER REGIONAL OFFICE	X	COMPLIANCE AUDITOR	X	OTHER	
V.D.H. - RICHMOND		OWNER	X	OTHER	
OWCP	X	OPERATOR		OTHER	

Photo 1. Railway #4 - West

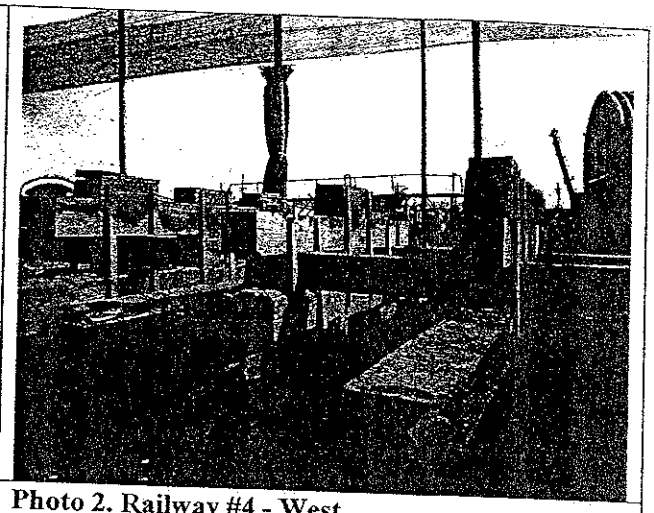

Photo 2. Railway #4 - West

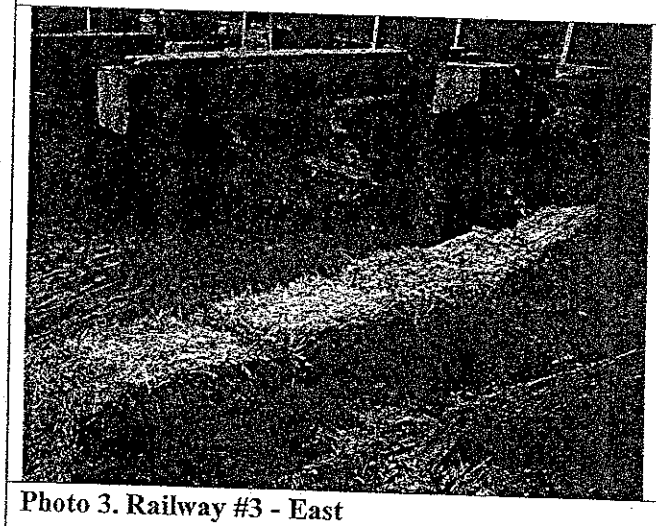

Photo 3. Railway #3 - East

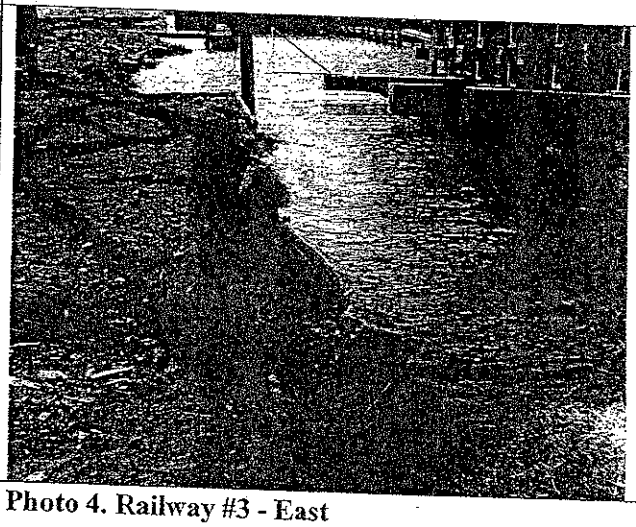

Photo 4. Railway #3 - East

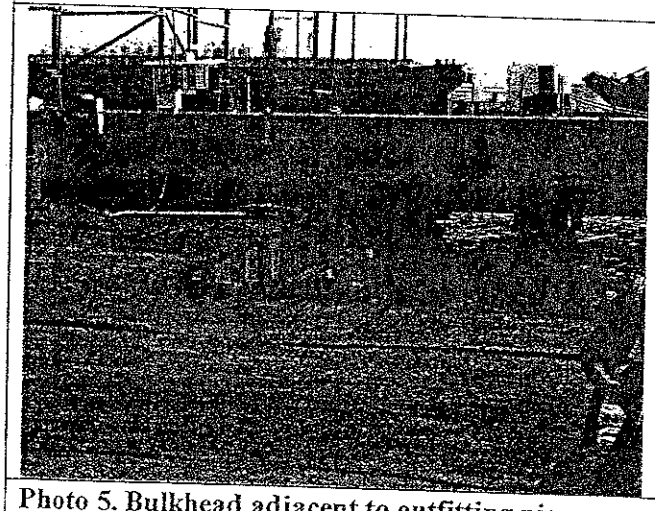

Photo 5. Bulkhead adjacent to outfitting pier.

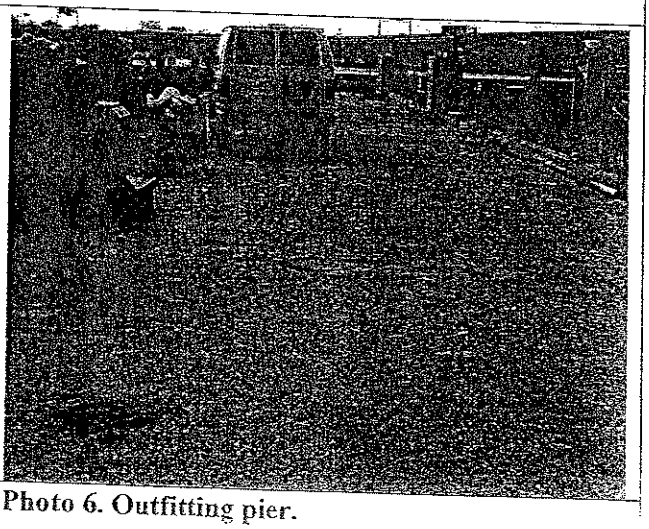

Photo 6. Outfitting pier.

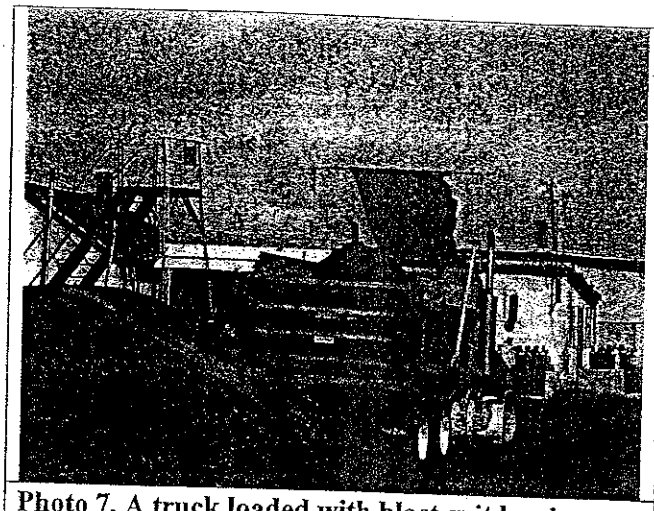

Photo 7. A truck loaded with blast grit leaving facility.

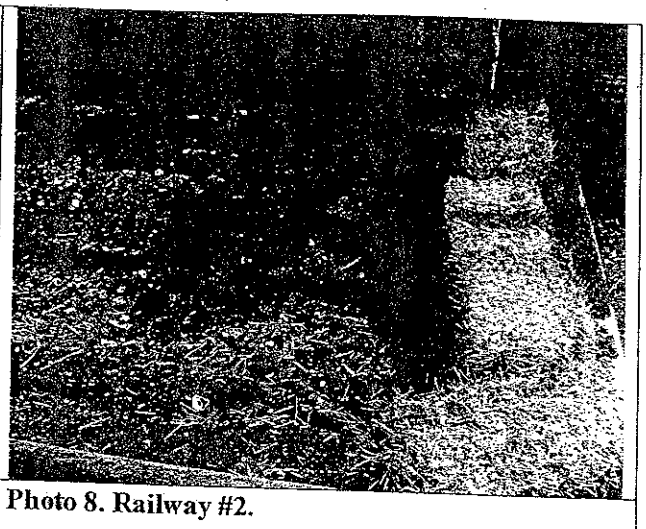

Photo 8. Railway #2.

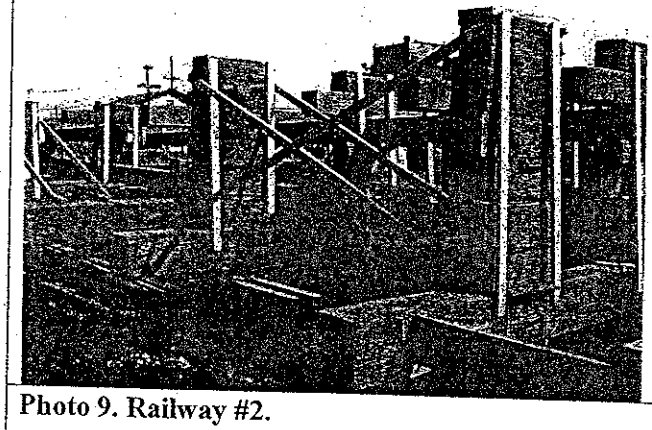

Photo 9. Railway #2.

Photo 10. Bulkhead on west side of Railway #1.

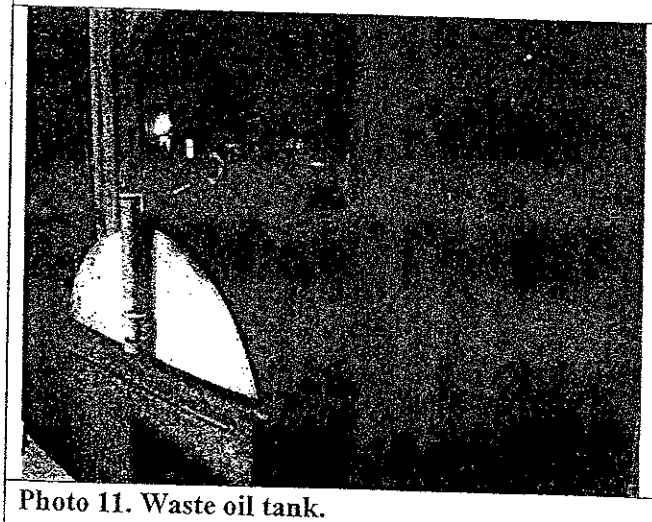

Photo 11. Waste oil tank.

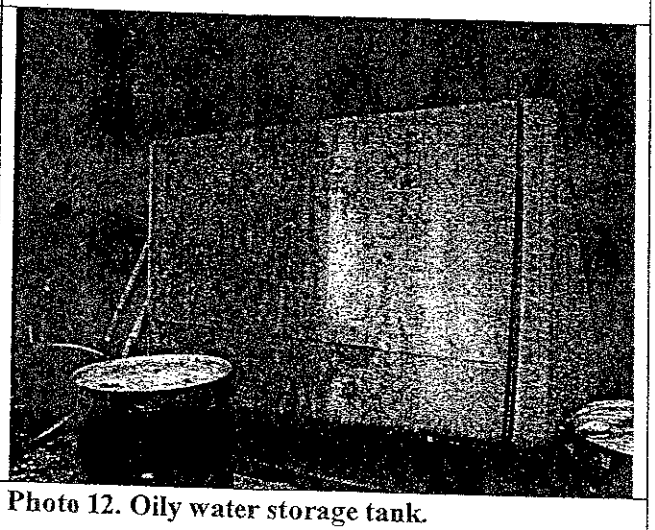

Photo 12. Oily water storage tank.

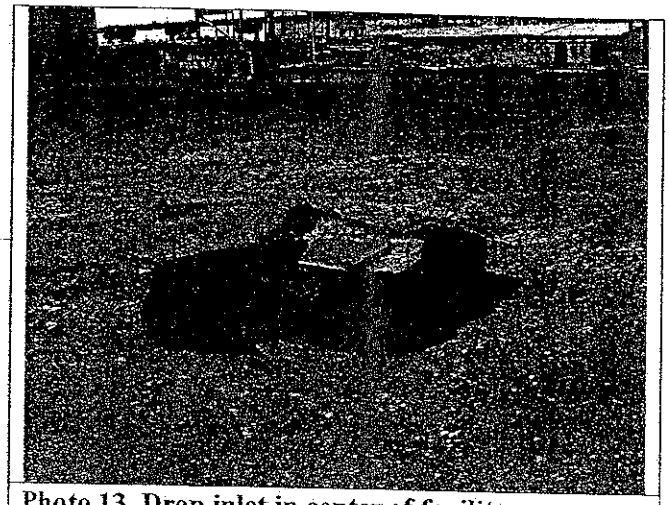

Photo 13. Drop inlet in center of facility.

Please print or type in the unshaded areas only.

EPA I.D. NUMBER (copy from Item 1 of Form 1): VAD003174885

Form Approved
OMB No. 2040-0086
Approval expires 5-31-92

FORM 2C NPDES

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (list)	B. LATITUDE 1. DEG.	2. MIN.	3. SEC.	C. LONGITUDE 1. DEG.	2. MIN.	3. SEC.	D. RECEIVING WATER (name)
001	36	51	34	76	20	41	Western Branch Elizabeth River
002	36	51	34	76	20	41	Western Branch Elizabeth River
003	36	51	33	76	20	42	Western Branch Elizabeth River
004	36	51	32	76	20	47	Western Branch Elizabeth River

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO. (list)	2. OPERATION(S) CONTRIBUTING FLOW a. OPERATION (list)	b. AVERAGE FLOW (include units)	3. TREATMENT a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
001/ 901	Marine Railway	8,000 sq. ft.	Storm Water	4	A
			Process Wastewater		
002/ 902	Marine Railway	3,500 sq. ft.	Storm Water	4	A
			Process Wastewater		
003/ 903	Marine Railway	9,000 sq. ft.	Storm Water	4	A
			Process Wastewater		
004/ 904	Marine Railway	3,600 sq. ft.	Storm Water	4	A
			Process Wastewater		
	Mud-yard Drain		Storm WAter	4	A
	See Table I attached.				

OFFICIAL USE ONLY (effluent guidelines sub-categories)

TABLE I
NUMBER AND DESCRIPTION OF OUTFALLS

OUTFALL NO.	DISCHARGE LOCATION	DISCHARGE SOURCE (1)	TREATMENT (2)	FLOW as MGD(3)
001 (901)	036°51'34" N 076°20'41" W 2-WBE000.57	SEE OUTFALL 003	SEE OUTFALL 003	
002 (902)	036°51'34" N 076°20'41" W 2-WBE000.58	SEE OUTFALL 003	SEE OUTFALL 003	
003 (903)	036°51'33" N 076°20'42" W 2-WBE000.63	**Process wastewater** discharges as generated during vessel repair and maintenance activities, includes wastewaters generated during initial vessel hull washing and those wastewaters resulting from high pressure and hydro-blasting activities to remove or re-profile existing hull coatings; Part I.A. monitoring will be required. **(Storm water)** falling upon the site and passing through each of the discrete locations of the conventional marine railways, is expected to become contaminated by process and waste materials. At this time, Part I.A. monitoring of storm water runoff is not required.	The permittee is expected to conduct the company's process activities in accordance with the established set of best management practices (BMP) contained in the current permit as well as any other actions necessary to comply with the terms, conditions and intent of the VPDES permit and associated laws and regulations. Unless suitable and relevant BMPs are continually imposed, it is believed that the process wastewater discharges will convey unacceptable loadings of potentially toxic metals and other pollutants to the receiving stream.	0.0001 per week (EPA form 2C)
004 (904)	036°51'32" N 076°20'47" W 2-WBE000.70	SAME	SAME	

(1) List operations contributing to flow
(2) Give brief description, unit by unit
(3) Give maximum 30-day average flow for industry and design flow for municipal

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☒ YES *(complete the following table)* ☐ NO *(go to Section III)*

1. OUTFALL NUMBER *(list)*	2. OPERATION(S) CONTRIBUTING FLOW *(list)*	3. FREQUENCY a. DAYS PER WEEK *(specify average)*	3. FREQUENCY b. MONTHS PER YEAR *(specify average)*	4. FLOW a. FLOW RATE *(in mgd)* 1. LONG TERM AVERAGE	4. FLOW a. FLOW RATE *(in mgd)* 2. MAXIMUM DAILY	4. FLOW b. TOTAL VOLUME *(specify with units)* 1. LONG TERM AVERAGE	4. FLOW b. TOTAL VOLUME *(specify with units)* 2. MAXIMUM DAILY	4. FLOW c. DURATION *(in days)*
001	Water washing of hull to remove saltwater, barnacles	Less than 1	12	.0001	.0001	.0001 mgd	.0001 mgd	Less than 1
002	Water washing of hull to remove saltwater, barnacles	Less than 1	12	.0001	.0001	.0001 mgd	.0001 mgd	.0001 mgd
003	Water washing of hull to remove saltwater, barnacles	Less than 1	12	.0001	.0001	.0001 mgd	.0001 mgd	.0001 mgd
004	Water washing of hull to remove saltwater, barnacles	Less than 1	12	.0001	.0001	.0001 mgd	.0001 mgd	.0001 mgd

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☐ YES *(complete Item III-B)* ☒ NO *(go to Section IV)*

B. Are the limitations in the applicable effluent guideline expressed in terms of production *(or other measure of operation)*?

☐ YES *(complete Item III-C)* ☐ NO *(go to Section IV)*

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION a. QUANTITY PER DAY	1. AVERAGE DAILY PRODUCTION b. UNITS OF MEASURE	1. AVERAGE DAILY PRODUCTION c. OPERATION, PRODUCT, MATERIAL, ETC. *(specify)*	2. AFFECTED OUTFALLS *(list outfall numbers)*

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES *(complete the following table)* ☒ NO *(go to Item IV-B)*

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS a. NO.	2. AFFECTED OUTFALLS b. SOURCE OF DISCHARGE	3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE a. REQUIRED	4. FINAL COMPLIANCE DATE b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs *(or other environmental projects which may affect your discharges)* you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. ☒ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

EPA I.D. NUMBER (copy from Item 1 of Form 1)
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V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding — Complete one set of tables for each outfall — Annotate the outfall number in the space provided. NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
None			

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in Item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ YES *(list all such pollutants below)* ☒ NO *(go to Item VI-B)*

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II. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☒ YES *(identify the test(s) and describe their purposes below)* ☐ NO *(go to Section VIII)*

Acute whole effluent toxicity testing using EPA Test Methods # 2007.0 and 2004.0 was performed or reported on grab samples of final effuent at outfalls 001-004 pursuant to Section C of the existing VPDES permit on the following dates:

003		001	002	004
1/26/05	3/6/06	12/9/04	11/17/04	10/14/04
2/8/05	6/23/06	11/2/05	11/29/05	8/15/05
11/16/05	8/8/06	11/1/06	10/12/06	11/1/06
11/21/05	10/23/06	10/22/07	12/20/07	11/12/07
5/17/05	2/12/08			
3/4/04				
6/2/04				
12/9/04				

III. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☒ YES *(list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)* ☐ NO *(go to Section IX)*

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)
Universal Laboratories	20 Research Drive Hampton, VA 23666	(757) 865-0880	chemical
Coastal Bioanalyst, Inc.	64 Enterprise Court Gloucester, VA 23061	(804) 694-8285	toxicity

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITLE *(type or print)*	B. PHONE NO. *(area code & no.)*
M. V. Craft, President	(757) 484-5320
C. SIGNATURE	**D. DATE SIGNED**
M V Craft	5/22/08

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets *(use the same format)* instead of completing these pages. SEE INSTRUCTIONS.

EPA I.D. NUMBER *(copy from Item 1 of Form 1)*: VAD003174885

V. INTAKE AND EFFLUENT CHARACTERISTICS *(continued from page 3 of Form 2-C)*

OUTFALL NO. 003

PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	3. UNITS (spec./s if blank) a. CONCENTRATION	3. UNITS b. MASS	4. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	4. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS	4. INTAKE (optional) b. NO. OF ANALYSES
a. Biochemical Oxygen Demand *(BOD)*												
b. Chemical Oxygen Demand *(COD)*												
c. Total Organic Carbon *(TOC)*												
d. Total Suspended Solids *(TSS)*	534				109.5		10	mg/L				
e. Ammonia *(as N)*	16.0				16.0			mg/L				
f. Flow	VALUE 0.0072		VALUE		VALUE		1	MGD		VALUE		
g. Temperature *(winter)*	VALUE		VALUE		VALUE			°C		VALUE		
h. Temperature *(summer)*	VALUE		VALUE		VALUE			°C		VALUE		
i. pH	MINIMUM 7.1	MAXIMUM 8.6	MINIMUM	MAXIMUM				STANDARD UNITS				

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. *(if available)*	2. MARK 'X' a. BELIEVED PRESENT	2. MARK 'X' b. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	4. UNITS b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS	5. INTAKE (optional) b. NO. OF ANALYSES
a. Bromide (24959-67-9)		X												
b. Chlorine, Total Residual	X		.71				.71		1	mg/L				
c. Color		X												
d. Fecal Coliform	X		7				7		1	CFU/100mL				
e. Fluoride (16984-48-8)		X												
f. Nitrate-Nitrite *(as N)*	X		0.36				0.36		1	mg/L				

CONTINUE ON REVERSE

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X' a. BELIEVED PRESENT	2. MARK 'X' b. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	3. EFFLUENT a. MAXIMUM DAILY VALUE (2) MASS	3. EFFLUENT b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	3. EFFLUENT b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	3. EFFLUENT c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	3. EFFLUENT c. LONG TERM AVRG. VALUE (if available) (2) MASS	3. EFFLUENT d. NO. OF ANALYSES	4. UNITS e. CONCENTRATION	4. UNITS f. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS	5. INTAKE (optional) b. NO. OF ANALYSES
g. Nitrogen, Total Organic (as N)		X												
h. Oil and Grease		X												
i. Phosphorus (as P), Total (7723-14-0)		X												
j. Radioactivity														
(1) Alpha, Total		X												
(2) Beta, Total		X												
(3) Radium, Total		X												
(4) Radium 226, Total		X												
k. Sulfate (as SO_4) (14808-79-8)		X												
l. Sulfide (as S)		X												
m. Sulfite (as SO_3) (14265-45-3)		X												
n. Surfactants		X												
o. Aluminum, Total (7429-90-5)		X												
p. Barium, Total (7440-39-3)		X												
q. Boron, Total (7440-42-8)		X												
r. Cobalt, Total (7440-48-4)		X												
s. Iron, Total (7439-89-6)		X												
t. Magnesium, Total (7439-95-4)		X												
u. Molybdenum, Total (7439-98-7)		X												
v. Manganese, Total (7439-96-5)		X												
w. Tin, Total (7440-31-5)		X												
x. Titanium, Total (7440-32-6)		X												

CONTINUE ON PAGE V-3

CONTINUED FROM PAGE 3 OF FORM 2-C

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
VAD003174885	003

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (*secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions*), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant in concentrations of 10 ppb or greater. If you mark column 2b for acrolein, acrylonitrile, 2,4 dinitrophenol, or 2-methyl-4, 6 dinitrophenol, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (*all 7 pages*) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (*if available*)	2. MARK "X"			3. EFFLUENT							4. UNITS		5. INTAKE (*optional*)		
	a. TEST-ING. REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30-DAY VALUE (*if available*)		c. LONG-TERM AVRG. VALUE (*if available*)		d. NO. OF ANAL-YSES	a. CONCEN-TRATION	b. MASS	a. LONG-TERM AVERAGE VALUE		b. NO. OF ANAL-YSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)	X		X							1	mg/L				
2M. Arsenic, Total (7440-38-2)	X		X	N.D.						1	mg/L				
3M. Beryllium, Total, (7440-41-7)			X												
4M. Cadmium, Total (7440-43-9)	X	X		0.005				0.005		1	mg/L				
5M. Chromium, Total (7440-47-3)	X		X	N.D.											
6M. Copper, Total (7440-50-8)	X	X		3621.0				525.7		10	ug/L				
7M. Lead, Total (7439-92-1)	X		X	N.D.						1	mg/L				
8M. Mercury, Total (7439-97-6)	X		X	N.D.											
9M. Nickel, Total (7440-02-0)	X		X	N.D.						1	mg/L				
10M. Selenium, Total (7782-49-2)	X		X	N.D.						1	mg/L				
11M. Silver, Total (7440-22-4)	X		X	N.D.						1	mg/L				
12M. Thallium, Total (7440-28-0)			X												
13M. Zinc, Total (7440-66-6)	X	X		344.0				152.8		10	ug/L				
14M. Cyanide, Total (57-12-5)	X	X		0.014						1	mg/L				
15M. Phenols, Total	X		X	N.D.						1	mg/L				
DIOXIN															
2,3,7,8-Tetrachlorodibenzo-P-Dioxin (1764-01-6)				DESCRIBE RESULTS											

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1. POLLUTANT AND CAS NUMBER (If available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (If available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (If available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – VOLATILE COMPOUNDS															
1V. Acrolein (107-02-8)	X		X	N.D.							1	mg/L			
2V. Acrylonitrile (107-13-1)	X		X	N.D.							1				
3V. Benzene (71-43-2)	X		X	N.D.							1				
4V. Bis (Chloromethyl) Ether (542-88-1)	X		X	N.D.							1				
5V. Bromoform (75-25-2)	X		X	N.D.							1				
6V. Carbon Tetrachloride (56-23-5)	X		X	N.D.							1				
7V. Chlorobenzene (108-90-7)	X		X	N.D.							1				
8V. Chlorodibromomethane (124-48-1)			X												
9V. Chloroethane (75-00-3)			X												
10V. 2-Chloroethylvinyl Ether (110-75-8)			X												
11V. Chloroform (67-66-3)	X		X	N.D.							1				
12V. Dichlorobromomethane (75-27-4)	X		X	N.D.							1				
13V. Dichlorodifluoromethane (75-71-8)			X												
14V. 1,1-Dichloroethane (75-34-3)			X												
15V. 1,2-Dichloroethane (107-06-2)			X												
16V. 1,1-Dichloroethylene (75-35-4)	X		X	N.D.							1				
17V. 1,2-Dichloropropane (78-87-5)	X		X	N.D.							1				
18V. 1,3-Dichloropropylene (542-75-6)			X												
19V. Ethylbenzene (100-41-4)	X		X	N.D.							1				
20V. Methyl Bromide (74-83-9)			X												
21V. Methyl Chloride (74-87-3)			X												

CONTINUED FROM PAGE V-4

1. POLLUTANT AND CAS NUMBER (If available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (If available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (If available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – VOLATILE COMPOUNDS *(continued)*															
22V. Methylene Chloride (75-09-2)	X		X												
23V. 1,1,2,2-Tetrachloroethane (79-34-5)	X		X												
24V. Tetrachloroethylene (127-18-4)															
25V. Toluene (108-88-3)	X		X												
26V. 1,2-Trans-Dichloroethylene (156-60-5)															
27V. 1,1,1-Trichloroethane (71-55-6)															
28V. 1,1,2-Trichloroethane (79-00-5)															
29V. Trichloroethylene (79-01-6)	X		X												
30V. Trichlorofluoromethane (75-69-4)															
31V. Vinyl Chloride (75-01-4)															
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)	X		X												
2A. 2,4-Dichlorophenol (120-83-2)	X		X												
3A. 2,4-Dimethylphenol (105-67-9)	X		X												
4A. 4,6-Dinitro-O-Cresol (534-52-1)															
5A. 2,4-Dinitrophenol (51-28-5)	X		X												
6A. 2-Nitrophenol (88-75-5)															
7A. 4-Nitrophenol (100-02-7)															
8A. P-Chloro-M-Cresol (59-50-7)															
9A. Pentachlorophenol (87-86-5)	X		X												
10A. Phenol (108-95-2)	X		X												
11A. 2,4,6-Trichlorophenol (88-06-2)	X		X												

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1. POLLUTANT AND CAS NUMBER (If available)	2. MARK 'X' a. TEST-ING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (If available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (If available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)	X		X												
2B. Acenaphtylene (208-96-8)															
3B. Anthracene (120-12-7)															
4B. Benzidine (92-87-5)	X		X												
5B. Benzo (a) Anthracene (56-55-3)	X		X												
6B. Benzo (a) Pyrene (50-32-8)	X		X												
7B. 3,4-Benzo-fluoranthene (205-99-2)	X		X												
8B. Benzo (ghi) Perylene (191-24-2)															
9B. Benzo (k) Fluoranthene (207-08-9)	X		X												
10B. Bis (2-Chloro-ethoxy) Methane (111-91-1)															
11B. Bis (2-Chloro-ethyl) Ether (111-44-4)	X		X												
12B. Bis (2-Chloroiso-propyl) Ether (102-60-1)	X		X												
13B. Bis (2-Ethyl-hexyl) Phthalate (117-81-7)	X		X												
14B. 4-Bromo-phenyl Phenyl Ether (101-55-3)															
15B. Butyl Benzyl Phthalate (85-68-7)	X		X												
16B. 2-Chloro-naphthalene (91-58-7)	X		X												
17B. 4-Chloro-phenyl Phenyl Ether (7005-72-3)															
18B. Chrysene (218-01-9)	X		X												
19B. Dibenzo (a,h) Anthracene (53-70-3)	X		X												
20B. 1,2-Dichloro-benzene (95-50-1)	X		X												
21B. 1,3-Dichloro-benzene (541-73-1)	X		X												

CONTINUE ON PAGE V-7

CONTINUED FROM PAGE V-6

1. POLLUTANT AND CAS NUMBER (If available)	2. MARK "X" a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (If available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (If available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (continued)															
22B. 1,4-Dichlorobenzene (106-46-7)	X		X												
23B. 3,3'-Dichlorobenzidine (91-94-1)															
24B. Diethyl Phthalate (84-66-2)															
25B. Dimethyl Phthalate (131-11-3)	X		X												
26B. Di-N-Butyl Phthalate (84-74-2)															
27B. 2,4-Dinitrotoluene (121-14-2)	X		X												
28B. 2,6-Dinitrotoluene (606-20-2)															
29B. Di-N-Octyl Phthalate (117-84-0)															
30B. 1,2-Diphenylhydrazine (as Azobenzene) (122-66-7)	X		X												
31B. Fluoranthene (206-44-0)															
32B. Fluorene (86-73-7)															
33B. Hexachlorobenzene (118-74-1)	X		X												
34B. Hexachlorobutadiene (87-68-3)	X		X												
35B. Hexachlorocyclopentadiene (77-47-4)	X		X												
36B. Hexachloroethane (67-72-1)	X		X												
37B. Indeno (1,2,3-cd) Pyrene (193-39-5)	X		X												
38B. Isophorone (78-59-1)	X		X												
39B. Naphthalene (91-20-3)	X		X												
40B. Nitrobenzene (98-95-3)	X		X												
41B. N-Nitrosodimethylamine (62-75-9)	X		X												
42B. N-Nitrosodi-N-Propylamine (621-64-7)	X		X												

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (continued)															
38B. N-Nitrosodiphenylamine (86-30-6)	X		X												
48B. Phenanthrene (85-01-8)															
68B. Pyrene (129-00-0)															
68B. 1,2,4-Trichlorobenzene (120-82-1)	X		X												
GC/MS FRACTION – PESTICIDES															
1P. Aldrin (309-00-2)	X		X												
2P. α-BHC (319-84-6)															
3P. β-BHC (319-85-7)															
4P. γ-BHC (58-89-9)															
5P. δ-BHC (319-86-8)															
6P. Chlordane (57-74-9)	X		X												
7P. 4,4'-DDT (50-29-3)															
8P. 4,4'-DDE (72-55-9)															
9P. 4,4'-DDD (72-54-8)															
10P. Dieldrin (60-57-1)	X		X												
11P. α-Endosulfan (115-29-7)															
12P. β-Endosulfan (115-29-7)															
13P. Endosulfan sulfate (1031-07-8)															
14P. Endrin (72-20-8)	X		X												
15P. Endrin Aldehyde (7421-93-4)	X		X												
16P. Heptachlor (76-44-8)	X		X												

CONTINUE ON PAGE V-9

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – PESTICIDES (continued)															
17P. Heptachlor Epoxide (1024-57-3)															
18P. PCB-1242 (53469-21-9)	X		X												
19P. PCB-1254 (11097-69-1)	X		X												
20P. PCB-1221 (11104-28-2)	X		X												
21P. PCB-1232 (11141-16-5)	X		X												
22P. PCB-1248 (12672-29-6)	X		X												
23P. PCB-1260 (11098-82-5)	X		X												
24P. PCB-1016 (12674-11-2)	X		X												
25P. Toxaphene (8001-35-2)	X		X												

* U.S. G.P.O.:1992-312-020:63176

KAUFMAN & CANOLES
| A Professional Corporation |
Attorneys and Counselors at Law

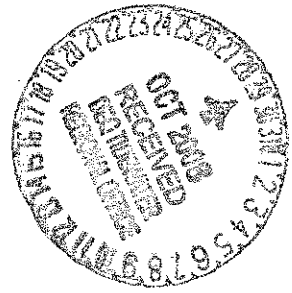
Marina Liacouras Phillips
757 / 624-3279
mlphillips@kaufcan.com

757 / 624-3000
fax: 757 / 624-3169

Mailing Address:
P.O. Box 3037
Norfolk, VA 23514

150 West Main Street
Suite 2100
Norfolk, VA 23510

October 24, 2008



Mr. Carl D. Thomas
Virginia Department of Environmental Quality
5636 Southern Boulevard
Virginia Beach, Virginia 23462

Re: **Associated Naval Architects, Inc.**
Draft Permit No. VA0087599
Our Matter No. 0131443

ORIGINAL PNAI
ROUTED TO
ADMIN 11/10/09

Dear Mr. Thomas:

This letter is being submitted on behalf of Associated Naval Architects, Inc. ("ANA") in response to the public notice and draft permit package enclosed with your letter to Mr. M. V. Craft dated September 26, 2008. ANA appreciates your comment that it has, in good faith, met the requirements and intent of their current VPDES permit. ANA will continue to work with the Virginia Department of Environmental Quality ("VDEQ") towards the issuance of the renewed permit for its Portsmouth, Virginia facility. The signed Authorization to Bill Applicant for a Public Notice is attached, but ANA does have comments regarding the draft permit that it would like to discuss with DEQ before a final permit is issued.

ANA understands that the DEQ is working with several similar ship repair facilities in Hampton Roads that are all seeking renewal of their surface water discharge permits. ANA expects that the basic terms addressing process and storm water sampling in the permit for each of these ship repair facilities will be the same. In the event that one applicant negotiates terms that do not contain certain sampling requirements, ANA requests that those sampling requirements also be omitted from its permit.

ANA has the following specific comments or questions regarding the draft of permit language received:

1. Page 9: Part I.B.6.(b)(1): ANA generates process waste water as defined in this draft permit every day. Does DEQ want a daily confirmation of water-generating events whether with a water hose or pressure washer?

2. Page 10: Part I.B.6.(b)(2): ANA questions the requirement that a report detailing additional or other innovative best management practices (BMPs) to control pollutants be submitted within ninety (90) days of permit issuance. The draft permit already sets forth thirty-one BMPs in Part I.B.7 with which ANA must comply. Those BMPs cover the range of protective activities available to permittees. ANA questions what a report on BMPs can add to those requirements already imposed by the permit.

3. Page 15 of 45: BMP 22: This practice requires that trash receptacles be provided on each pier. ANA does not use all its piers. Can this practice be amended to require the placement of trash receptacles solely on piers that are used?

4. Page 16: BMP 27: ANA has had discussions with the DEQ regarding this practice. Due to the configurations of the marine railways at ANA, it is not possible to haul vessels beyond the normal high tide zone. ANA has agreed to limit work on the aft end of the vessel when it is over water. This has been documented in enforcement related correspondence and in the permit application. Can this practice be modified to recognize the configuration of the ANA marine railway?

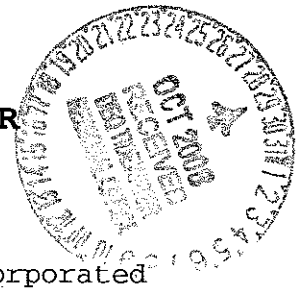
5. Page 22: Part I.D.2.b: ANA questions the requirement that the each storm event be recorded on site. The information required by this section can be obtained from records kept by other entities.

If you have any questions or comments, do not hesitate to contact me.

Very truly yours,

Marina Liacouras Phillips

MLP:cr
::ODMA\PCDOCS\DOCSNFK\1413807\2
Enc.
cc: Brandt C. Everhart, Esq. (w/enc.)
Mr. Bill Espich (w/enc.)



AUTHORIZATION TO BILL APPLICANT FOR A PUBLIC NOTICE FOR

FACILITY NAME: Associated Naval Architects, Incorporated
LOCATION: Portsmouth, Virginia
VPDES PERMIT: VA0087599

I hereby authorize the Department of Environmental Quality to have the cost of publishing a public notice billed to the Agent/Department shown below. The public notice will be published once a week for two consecutive weeks in the:

The Virginian Pilot
Legal Advertising Department
150 W. Brambleton Avenue
Norfolk, VA 23510

Agent/Department to be billed: Accounts Payable

Associated Naval Architects

Applicant's Address: 3400 Shipwright St.

Portsmouth, VA 23703

Agent's Telephone No: 757-484-5320

I AM ALSO AUTHORIZING THE - Virginian Pilot - TO SEND THE AFFIDAVIT TO:

DEQ TIDEWATER REGIONAL OFFICE
ATTENTION: MS. JEANNIE MASTICE
5636 SOUTHERN BOULEVARD
VIRGINIA BEACH, VA 23462

Authorizing Agent/Date Signed: Brandt Everhart 10/24/08

Print Name/Date Signed

Authorizing Agent's Signature: Brandt Everhart

Signature

RETURN COMPLETED FORM TO: DEQ - Tidewater Regional Office
Ms. Jeannie Mastice
5636 Southern Boulevard
Virginia Beach, VA 23462

Cc: **(DEQ FILE XXXX PPP)**

KAUFMAN & CANOLES
A Professional Corporation
Attorneys and Counselors at Law

Marina Liacouras Phillips
757 / 624-3279
mlphillips@kaufcan.com

757 / 624-3000
fax: 757 / 624-3169

Mailing Address:
P.O. Box 3037
Norfolk, VA 23514

150 West Main Street
Suite 2100
Norfolk, VA 23510

November 7, 2008

Mr. Carl D. Thomas
Virginia Department of Environmental Quality
5636 Southern Boulevard
Virginia Beach, Virginia 23462

Re: **Associated Naval Architects, Inc.**
Draft Permit No. VA0087599
Our Matter No. 0131443

Dear Mr. Thomas:

We recently learned that Lyons Shipyard, Inc. requested the opportunity to meet with you and Frank Daniel regarding the terms of the permits for marine railways that are currently under consideration. This is to let you know that Associated Naval Architects Inc. agrees that such a meeting would be extremely productive. The reissuance of these permits raises issues common to all the local shipyards with marine railways that should be addressed in a group meeting. We would be happy to participate.

Please let us know when and if this meeting is scheduled.

Very truly yours,

Marina Liacouras Phillips

Marina Liacouras Phillips

cc: Brandt C. Everhart, Esq.

:1421863\1